

EXHIBIT 2

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

KATHLEEN KITTERMAN,)
ANNA CRONIN,)
CORRIE BALL,) Case No. 2:12cv146
MARVIN BALL,)
MARGARET BROGAN and)
EVAN JONES,)
v.)
PLAINTIFFS,)
v.)
CLAUDIO TOVAR-GUZMAN, and)
FORTINO GARCIA AND SONS HARVESTING, INC.,)
Defendants.)

CORRIE BALL'S RESPONSES TO UNITED SERVICES AUTOMOBILE
ASSOCIATION'S INTERROGATORIES AND REQUEST FOR PRODUCTION OF
DOCUMENTS

NOW COMES the undersigned Defendant, by counsel, and propounds the following Interrogatories to the Plaintiff, **CORRIE BALL**, to be answered in proper person, separately and fully, under oath, and makes a Request for Production of Documents described below, said Interrogatories to be answered and said documents to be produced within thirty (30) days of service hereof, pursuant to Rule 33(b) of the Federal Rules of Civil Procedure and said Interrogatories and Request for Production to be continuing until the time of trial of this action.

INTERROGATORIES

1. State your full name (and all previous names i.e., maiden name, etc.), your current residence, your occupation and employer's address, your residence, occupation and employer's address at the time of the accident, your date and place of birth, and your Social Security number; whether you have ever been in the armed services and if presently on active duty, please state your status, and if you have been discharged, please state the date of discharge.

ANSWER: **Corrie Daniel Ball**

Norfolk, VA 23508

DOB: 1994

SSN: 1131

Student at James Madison University. Never in Armed Services not on Active duty.

2. Describe with particularity your observation as to how the event giving rise to this litigation occurred, including in that answer facts which indicate that the Defendant was negligent.

ANSWER: We were seated passengers in a Chrysler minivan stopped at a red light when a bus the size of a school bus struck the Chrysler minivan in the rear with such force as I have never felt before. The force threw me forward into the captain's seat in front of me until the seatbelt restraining me caught me and jerked me back. The force jerked my head backwards with such force that when my head hit it bruised my head; at the same time it forced my teeth together and chipped my molar in the back of my mouth. I was dazed and it knocked the wind out of me. Even after my breath returned, I felt confused and could not understand what was going on. I looked to my left and saw Kelly hanging from her seat belt slumped over lifeless. I saw Anna in the same sort of manner. The only difference was that Anna seemed alive, but Kelly did not. I screamed. My Dad was driving and he turned around to see if everyone was

CORRIE DANIEL BALL

By Patrick M. Brogan
Of Counsel

Patrick M. Brogan, VSB No. 25568
Bryan K. Meals, VSB No. 40184
Attorneys for Plaintiffs
DAVEY & BROGAN, P.C.
101 Granby Street, Suite 300
Norfolk, Virginia 23514-3490
(757) 622-0100
(757) 622-4924 (fax)
pbrogan@daveybroganpc.com
bmeals@daveybroganpc.com

CERTIFICATE OF SERVICE

2nd May
I hereby certify that on the 16th day of April, 2013 the above C. Ball's Answers to USAA's Interrogatories and Requests for Production of Documents were hand delivered to the Norfolk counsel and mailed first-class, postage prepaid to:

Todd M. Fiorella, Esquire; Virginia State Bar No. 30238
John Baker, Esquire
Attorney for USAA
Fraim & Fiorella, P.C.
150 Boush Street, Suite 601
Norfolk, Virginia 23510
Telephone: (757) 227-5900
Facsimile: (757) 227-5901
tmfiorella@ff-legal.com
jbaker@ff-legal.com

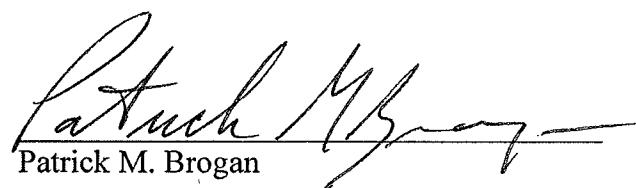
Brian N. Casey, Esquire
Virginia State Bar No. 26710
James E. Brydges, Jr., Esquire
Virginia State Bar No. 4420
Attorneys for Kuzzens, Inc.
TAYLOR WALKER, P.C.
Post Office Box 3490
Norfolk, Virginia 23514-3490
(757) 625-7300
(757) 625-1504 (fax)
bcasey@taylorwalkerlaw.com

rydges@taylorwalkerlaw.com

James R. Jebo, Esquire, Virginia State Bar No. 48418
Michael E. Harman, Esquire, Virginia State Bar No. 16813
Lynne J. Blain, Esquire, Virginia State Bar No. 23719
Attorneys for Claudio Tovar-Guzman and

Fortino Garcia and Sons Harvesting, Inc.
HARMAN, CLAYTOR, CORRIGAN & WELLMAN
Post Office Box 70280
Richmond, Virginia 23255
(804) 747-5200
(804) 747-6085 (fax)
jjdbo@hccw.com
mharman@hccw.com
lblain@hccw.com

H. Robert Yates, III, Esquire
LeClair Ryan
123 East Main Street, Eight Floor
Charlottesville, VA 22902
(434) 245-3425
(434) 296-0905
robert.yates@leclairryan.com
Counsel for ACE American Insurance Company



Patrick M. Brogan